

ORIGINAL

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United States Attorney
District of Hawaii

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

JUL 15 2019

at 3 o'clock and 40 min. P M
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cc: DKW
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Attorneys for Plaintiff
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

CR19 00095 DKW

UNITED STATES OF AMERICA,)	CR. NO. _____
)	
Plaintiff,)	INFORMATION
)	
vs.)	[18 U.S.C. § 472]
)	
ELVIS PRES LEE,)	
)	
Defendant.)	

INFORMATION

The U.S. Attorney charges:

Uttering Counterfeit Obligations
(18 U.S.C. § 472)

On or about March 15, 2019, within the District of Hawaii, ELVIS PRES LEE, the defendant, with intent to defraud, did pass and utter to a teller at the American Eagle Outfitters clothing store in the Ala Moana Shopping Center, four falsely made, forged and counterfeited obligations of the United States, that is, four Federal Reserve Notes each in the denomination of one hundred dollars, bearing Serial Nos. KB83729583, CF45864545C, CH01788588H, and HK06512233C, which he then knew to be falsely made, forged and counterfeited,

All in violation of Title 18, United States Code, Section 472.

FIRST FORFEITURE NOTICE

1. The allegations contained in all paragraphs of this Information are realleged and incorporated by reference for the purpose of noticing forfeitures pursuant to Title 18, United States Code, Section 982(a)(2)(B).

2. The United States hereby gives notice to ELVIS PRES LEE, the defendant, that, upon conviction of the offense in violation of Title 18, United States Code, Section 472, charged in this Information, the government will seek forfeiture, pursuant to Title 18, United States Code, Section 982(a)(2)(B), of any and all property constituting, or derived from, proceeds the person obtained directly or indirectly, as the result of such violation.

3. If by any act or omission of ELVIS PRES LEE, the defendant, any of the property subject to forfeiture described in paragraph 2 herein:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided

without difficulty,

the United States of America will be entitled to forfeiture of substitute property up to the value of the property described above in paragraph 2, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1).

SECOND FORFEITURE NOTICE

1. The allegations contained in all paragraphs of this Information are realleged and incorporated by reference for the purpose of noticing forfeitures pursuant to Title 18, United States Code, Section 492.

2. The United States hereby gives notice to ELVIS PRES LEE, the defendant, that, upon conviction of the offense in violation of Title 18, United States Code, Section 472, charged in this Information, the government will seek forfeiture, pursuant to Title 18, United States Code, Section 492, of any counterfeits of any coins or obligations or other securities of the United States or of any foreign government, and any articles, devices, and other things made,

possessed, or used in violation of Title 18, United States Code, Section 472, and any material or apparatus used or fitted or intended to be used, in the making of such counterfeits, articles, devices, or things, found in the possession of any person without authority from the Secretary of the Treasury or other proper officer, including but not limited to one HP Envy 5052 printer bearing serial number M2U85-80021, seized on or about March 3, 2019, at Honolulu International Airport.

3. If by any act or omission of ELVIS PRES LEE, the defendant, any of the property subject to forfeiture described in paragraph 2 herein:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided

without difficulty,

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the United States of America will be entitled to forfeiture of substitute property up to the value of the property described above in paragraph 2, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461.

DATED: July 15, 2019, at Honolulu, Hawaii.



KENJI M. PRICE
United States Attorney
District of Hawaii



MARC A. WALLENSTEIN
Assistant United States Attorney

United States v. Elvis Pres Lee
Information
Cr. No.